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LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

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NOV 13 1990

REPLY TO ATTENTION OF:

Mr. Andrew P. Avel
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

5HR-12

RE: QAPP
U.S. DOE Fernald
OH6 890 008 976

Dear Mr. Avel:

In a May 8, 1990, letter, the United States Environmental Protection Agency (U.S. EPA) provided notice that the March 1988 version of the Quality Assurance Program Plan (QAPP) must be revised to reflect needed changes that were discussed in several meetings between U.S. EPA and the United States Department of Energy (U.S. DOE). The revised document was to have been submitted within sixty (60) days (July 9, 1990). In a June 18, 1990, telephone conversation and a July 9, 1990, letter, U.S. DOE stated a revision would not be submitted until September 14, 1990. On September 14, 1990, U.S. DOE submitted recently generated change pages for proposed revisions to the document.

During an October 5, 1990, teleconference on another matter, a discrepancy in the QAPP was discovered. Old change pages produced by U.S. DOE's contractors had never been submitted to U.S. EPA. U.S. DOE personnel and contract representatives stated that the version of the QAPP that the site is currently using is dated February 1989. The version that the United States Environmental Protection (U.S. EPA) approved was revised in March 1988. The later version(s) was not submitted to U.S. EPA for review and approval. The site is required to follow the currently approved QAPP for all remedial and removal response actions at the site. The fact that U.S. DOE revised and implemented a new QAPP without approval puts all samples collected and analyzed and data validated under the unapproved revisions in question.

As required in U.S. EPA's October 7, 1990, letter, U.S. DOE was to revise this document and submit it to U.S. EPA by November 7, 1990. U.S. DOE submitted the revision on November 8, 1990. U.S. DOE's transmittal letter (dated November 7, 1990) incorrectly states that changes to the QAPP were submitted to U.S. EPA and an

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attachment states that the majority of the revisions were approved. U.S. EPA and the Ohio Environmental Protection Agency communicated to you several months ago that proposed change to the Remedial Investigation / Feasibility Study (RI/FS) work plan were never forwarded to our respective agencies. In the October 5, 1990, conference call and a follow-up call on the same day, U.S. EPA informed U.S. DOE that the "old" proposed QAPP change pages were ever submitted to or approved by U.S. EPA.

Additionally, U.S. EPA has indicated to U.S. DOE that use of the on-site laboratory for sample analysis for the CERCLA response actions is not acceptable. The proposed November 8, 1990, QAPP again puts forth this proposal.

U.S. DOE must assure that other portions of the approved Remedial Investigation/Feasibility Study (RI/FS) work plan are being following and that any revisions are submitted to U.S. EPA for approval. Within fifteen (15) days, U.S. DOE should specify in writing what changes in the work plan were made but not forwarded to U.S. EPA for approval.

U.S. EPA is reviewing the revised QAPP and will provide comments or approval.

Please contact me at (312/FTS) 886-4436, if there are questions.

Sincerely,



Catherine A. McCord
Remedial Project Manager

cc: Richard Shank, Ohio EPA
Graham Mitchell, Ohio EPA
Joe LaGrone, U.S. DOE
Leo Duffy, U.S. DOE